



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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RSB  
F. #2021R00629

271 Cadman Plaza East  
Brooklyn, New York 11201

April 23, 2024

By ECF and Email

Honorable Sanket J. Bulsara  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Xin Jin Chen  
Criminal Docket No. 22-458 (LDH)

Dear Judge Bulsara:

Attached please find the elements sheet related to Xin Jin Chen used at defendant's guilty plea that took place on March 20, 2024.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/  
Raffaela S. Belizaire  
Assistant U.S. Attorney  
(718) 254-6295

cc: Clerk of the Court (SJB)  
Arthur Kenneth Womble, Jr. (counsel for defendant)

BW/MG/RB  
F. #2021R00629

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

ELEMENTS SHEET

- against -

22-CR-458 (LDH) (SJB)

XIN JIN CHEN,  
also known as "Hui Chen,"

Defendant.

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The government respectfully submits this elements sheet to advise the Court of the elements of Count Eleven of the above-captioned indictment, which charges the defendant XIN JIN CHEN with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h).

Count Eleven – Conspiracy to Commit Money Laundering

The elements of conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h) are as follows:

1. There was an agreement between two or more persons to commit money laundering, and
2. The defendant knowingly and intentionally became a member of the conspiracy.<sup>1</sup>

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<sup>1</sup> Adapted from Jury Instruction, United States v. Napout, 15-CR-252 (PKC) (Dec. 26, 2017) (ECF No. 872).

The elements of money laundering in violation of 18 U.S.C. § 1957(a) are as follows:

1. The defendant engaged in a monetary transaction in or affecting interstate commerce;
2. The monetary transaction involved criminally derived property of a value greater than \$10,000;
3. The property was derived from specified unlawful activity;
4. The defendant acted with knowledge that the transaction involved proceeds of a criminal offense; and
5. The transaction took place in the United States, or the defendant is a United States citizen, national, or permanent resident.<sup>2</sup>

Dated: Brooklyn, New York  
March 19, 2024

Respectfully submitted,

BREON PEACE  
United States Attorney  
Eastern District of New York

By: \_\_\_\_\_/s/  
Benjamin Weintraub  
Miranda Gonzalez  
Raffaela Belizaire  
Assistant United States Attorneys  
(718) 254-7000

cc: Kenneth Womble, Esq.

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<sup>2</sup> Adapted from Sand, Modern Federal Jury Instructions, Instruction 50A-26.